

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**CHARLESTON DIVISION**

CA: 2:12-2047

*IN RE: C.R. Bard, Inc.,  
Pelvic Repair System Products Liability Litigation.  
MDL no. 2187*

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**SHORT FORM COMPLAINT**

Come now the Plaintiff(s) named below, and for Complaint against the Defendants named below, incorporate The Master Complaint in MDL No. 2187 by reference. Plaintiff(s) further show the court as follows:

1. Female Plaintiff

Patricia Metzger

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2. Plaintiff Husband

Raymond B. Metzger

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3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator)

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4. State of Residence

Ohio

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5. District Court and Division in which action is to be filed upon transfer from the MDL.

U. S. District Court, Southern District of Ohio

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6. Defendants (Check Defendants against whom Complaint is made):

A. C. R. Bard, Inc. ("Bard")

B. Sofradim Production SAS ("Sofradim")

( )C. Tissue Science Laboratories Limited (“TSL”)

(x)D. Other defendants

Johnson & Johnson

Ethicon, Inc.

7. Basis of Jurisdiction

Diversity of Citizenship

8. A. Paragraphs in Master Complaint upon which venue and jurisdiction lie:

Paragraphs 1 – 8 of the Master

Complaint

B. Other allegations of jurisdiction and venue

A substantial amount of the events leading to Plaintiff's injuries arose in Ohio  
making venue proper.

9. Defendants' products implanted in Plaintiff (Check products implanted in Plaintiff)

( )A. The Align Urethral Support System;

( )B. The Align TO Urethral Support System;

( )C. The Avaulta Anterior BioSynthetic Support System;

( )D. The Avaulta Posterior BioSynthetic Support System;

( )E. The Avaulta Plus Anterior BioSynthetic Support System;

( )F. The Avaulta Plus Posterior BioSynthetic Support System;

- ( )G. The Avaulta Solo Anterior Synthetic Support System;
- ( )H. The Avaulta Solo Posterior Synthetic Support System;
- ( )I. The InnerLace BioUrethral Support System;
- ( )J. The Pelvicol Acellular Collagen Matrix;
- ( )K. The PelviLace BioUrethral Support System;
- ( )L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ( )M. The PelviSoft Acellular Collagen BioMesh;
- ( )N. The Pelvitex Polypropylene Mesh;
- ( )O. The Uretex SUP Pubourethral Sling;
- (x)P. The Uretex TO Trans-obturator Urethral Support System;
- ( )Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ( )R. The Uretex TO3 Trans-obturator Urethral Support System.

(x)S. Other

Gynecare Prolift

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10. Defendants' Products about which Plaintiff is making a claim. (Check applicable products)

- ( )A. The Align Urethral Support System;
- ( )B. The Align TO Urethral Support System;
- ( )C. The Avaulta Anterior BioSynthetic Support System;
- ( )D. The Avaulta Posterior BioSynthetic Support System;
- ( )E. The Avaulta Plus Anterior BioSynthetic Support System;
- ( )F. The Avaulta Plus Posterior BioSynthetic Support System;
- ( )G. The Avaulta Solo Anterior Synthetic Support System;
- ( )H. The Avaulta Solo Posterior Synthetic Support System;

- ( )I. The InnerLace BioUrethral Support System;
- ( )J. The Pelvicol Acellular Collagen Matrix;
- ( )K. The PelviLace BioUrethral Support System;
- ( )L. The PelviLace TO Trans-obturator BioUrethral Support System;
- ( )M. The PelviSoft Acellular Collagen BioMesh;
- ( )N. The Pelvitex Polypropylene Mesh;
- ( )O. The Uretex SUP Pubourethral Sling;
- (x)P. The Uretex TO Trans-obturator Urethral Support System;
- ( )Q. The Uretex TO2 Trans-obturator Urethral Support System; and
- ( )R. The Uretex TO3 Trans-obturator Urethral Support System.

(x)S. Other

Gynecare Prolift

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11. Date of Implantation as to Each Product

November 23, 2005 – Uretex Urethral

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Support System

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October 2, 2008 – Gynecare Prolift

12. Hospital(s) where Plaintiff was implanted (including City and State)

Dayton Physicians, LLC – Dayton, OH

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Kettering Medical Center – Dayton, OH

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13. Implanting Surgeon(s)

Bhadresh Doshi, M.D.

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Sharat Kalvakota, M.D.

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14. Counts in the Master Complaint brought by Plaintiff(s)

- (x) Count I
- (x) Count II
- (x) Count III
- (x) Count IV
- (x) Count V
- (x) Count VI
- (x) Count VII (by the Husband)
- (x) Count VIII

/s/ Andrea S. Hirsch

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